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8 Attorneys for Plaintiff  
9 Shoreline Capital Management, Ltd.

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12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN JOSE DIVISION

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16 SHORELINE CAPITAL MANAGEMENT,  
17 LTD., a British Virgin Islands company  
18 limited by shares,

No. JW CV 08 0121

19 Plaintiff,

20 vs.

21 XIAOBING SUN, an individual, also known  
22 as DANIEL SUN,

23 DECLARATION OF HAIQIANG HUANG  
24 SUPPORTING *EX PARTE* APPLICATION  
25 FOR TRO AND OSC RE PRELIMINARY  
26 INJUNCTION, AND FOR ORDER  
GRANTING LEAVE TO CONDUCT  
EXPEDITED DISCOVERY

Defendant.

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28 I, Haiqiang Huang, say:

1. I am an employee of Shoreline Capital Consulting (Shenzhen) Co., Ltd.  
(Shoreline Shenzhen), the wholly-owned subsidiary of Shoreline Capital Management, Ltd.  
(Shoreline), the Plaintiff in this action. I have personal knowledge of the matters set forth in this  
Declaration and would competently testify to them if called as a witness.

1           2. On February 8, 2006, I became an asset manager with Shoreline Shenzhen  
2 and am still employed as a team manager over the servicing of debt portfolios in Shenzhen  
3 which were an investment totaling over 20 million U.S. dollars and which were purchased from  
4 Cinda Asset Management Company (Cinda). In this capacity working for Shoreline Shenzhen, I  
5 have become well acquainted with Cinda's personnel and potential deals.

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7           3. On September 24, 2007, Xiaobing Sun contacted me and told me that he  
8 was working with a Beijing lawyer and hoping to acquire a portfolio of loans in Shenzhen district  
9 from Cinda's Guangzhou office. He asked me to be his agent and introduce him to managers in  
10 Cinda's Guangzhou office and obtain the managers' approval to allow Mr. Sun to start due  
11 diligence on the asset files for the portfolio of loans. This conversation gave me the false  
12 impression that Mr. Sun was asking for those things in the interest of and as a part of Shoreline's  
13 business.

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15           I declare under penalty of perjury under the laws of the United States that the  
16 foregoing is true and correct.

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18           Executed this \_\_\_\_ day of January, 2008 at 深 地 (Shenzhen)  
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黄海强 (Haiqiang Huang)  
Haiqiang Huang

DECLARATION OF HAIQIANG HUANG SUPPORTING EX PARTES APPLICATION FOR TAD  
AND OSC RE PRELIMINARY INJUNCTION, AND FOR ORDER GRANTING LEAVE TO  
CONDUCT EXPEDITED DISCOVERY